

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :
DUNG TRUNG DUONG : CHAPTER 13
d/b/a D-NAILS :
Debtor : CASE NO.: 1-19-04382
:
CHARLES J. DEHART, III :
STANDING CHAPTER XIII TRUSTEE :
Movant :
vs. :
DUNG TRUNG DUONG :
d/b/a D-NAILS :
Respondent :

ANSWER TO TRUSTEE'S MOTION TO DISMISS CASE

NOW COMES the Debtor, DUNG TRUNG DUONG, d/b/a D-NAILS, by and through their attorney, Charles E. Petrie, and respectfully answer as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. It is denied that debtor has unreasonably delayed in forwarding the required information to the Trustee.
5. Denied. Debtor has provided verification of the requested information to the Trustee's office by FAX.
6. Admitted.

WHEREFORE, Debtor respectfully requests that Your Honorable Court dismiss Trustee's Motion to Dismiss Case.

/s/ Charles E. Petrie
CHARLES E. PETRIE
3528 Brisban Street
Harrisburg, Pennsylvania 17111
(717) 561-1939
Attorney for Debtor

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| Debtor | : | CASE NO.: 1-19-04382 |
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| CHARLES J. DEHART, III | : | |
| STANDING CHAPTER XIII TRUSTEE | : | |
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| vs. | : | |
| DUNG TRUNG DUONG | : | |
| d/b/a D-NAILS | : | |
| Respondent | : | |

CERTIFICATE OF SERVICE

I, CHARLES E. PETRIE, ESQUIRE, do hereby certify that on this date, I served a true and correct copy of the within Answer, in the above-captioned matter upon the following individual(s), by United States first-class mail, postage prepaid, or by electronic means addressed as follows:

CHARLES J. DEHART, III,
STANDING CHAPTER 13 TRUSTEE
8125 ADAMS DRIVE, SUITE A
HUMMELSTOWN, PA 17036

DATE: December 19, 2019

/s/ Charles E. Petrie
CHARLES E. PETRIE
3528 Brisban Street
Harrisburg, PA 17111
(717) 561-1939
Attorney for Debtor
ID# 29029